

1  
2  
3  
4  
5  
6  
7  
8 **UNITED STATES DISTRICT COURT**  
9 **CENTRAL DISTRICT OF CALIFORNIA**  
10 **SOUTHERN DIVISION**  
11

12 K.A.,

13 Plaintiff,

14 v.  
15

16 MINDGEEK S.A.R.L.; MG  
17 FREESITES, LTD; MINDGEEK USA  
18 INCORPORATED; MG PREMIUM  
19 LTD.; MG GLOBAL  
20 ENTERTAINMENT INC.; 9219-1568  
21 Quebec, Inc.; BERND BERGMAIR;  
22 FERAS ANTOON; DAVID TASSILLO;  
23 COREY URMAN; VISA INC.;  
24 REDWOOD CAPITAL  
25 MANAGEMENT, LLC ; REDWOOD  
26 DOE FUNDS 1-7 ; COLBECK  
27 CAPITAL MANAGEMENT, LLC;  
28 COLBECK DOE FUNDS 1-3,

Defendants.

Case No. 2:24-CV-04786-WLH-ADS

**[PROPOSED] ORDER GRANTING  
VISA'S OMNIBUS MOTION TO  
DISMISS**

Date: January 31, 2025

Time: 1:30 p.m.

Judicial Officer: Wesley L. Hsu

Courtroom: 9B

Defendant Visa, Inc.’s Omnibus Motion to Dismiss for Failure to State a Claim (“Visa’s Omnibus Motion to Dismiss”) came before this Court for hearing on January 31, 2025. Visa argued that the claims against it should be dismissed because (i) the Complaints did not state a claim for relief against Visa under the Trafficking Victims Protection Reauthorization Act (“TVPRA”), 18 U.S.C. § 1591(a)(2) or any other secondary liability theory (Count II); (ii) the Complaints did not plausibly allege any conspiracy claim against Visa (Counts IV & XVII); (iii) the Complaints did not plausibly allege any claims for relief under California state law (Count XIV); (iv) the Complaints did not plausibly allege any intentional infliction of emotional distress claim against Visa (Count XVI); and that (v) dismissal with prejudice was warranted because any amendment would be futile. Having considered the papers and arguments of counsel submitted in connection with Visa’s Omnibus Motion to Dismiss, and finding good cause appearing, IT IS HEREBY ORDERED that:

Visa’s Omnibus Motion to Dismiss Counts II, IV, XIV, XVI, and XVII for failure to state a claim is GRANTED for the following cases:

*K.A. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04786-WLH-ADS (C.D. Cal. June 7, 2024); *L.T. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04791-WLH-ADS (C.D. Cal. June 7, 2024); *N.L. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04788-WLH-ADS (C.D. Cal. June 7, 2024); *N.Y. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04801-WLH-ADS (C.D. Cal. June 7, 2024); *T.C. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04795-WLH-ADS (C.D. Cal. June 7, 2024); *X.N. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04800-WLH-ADS (C.D. Cal. June 7, 2024); *J.C. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04971-WLH-ADS (C.D. Cal. June 12, 2024); *C.S. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04992-WLH-ADS (C.D. Cal. June 13, 2024); *S.O. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04998-WLH-ADS (C.D. Cal. June 13, 2024); *W.L. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-04977-WLH-ADS (C.D. Cal. June 13, 2024); *L.S. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-05026-WLH-ADS (C.D. Cal. June 14,

2024); *A.K. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-05190-WLH-ADS (C.D. Cal. June 20, 2024); *W.P. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-05185-WLH-ADS (C.D. Cal. June 20, 2024); and *J.L. v. MindGeek, S.à.r.l., et al.*, Case No. 2:24-cv-7046-WLH-ADS (C.D. Cal. Aug. 20, 2024); and

Plaintiffs' claims against Visa in their Complaints are DISMISSED WITH PREJUDICE.

Dated: \_\_\_\_\_

HONORABLE WESLEY L. HSU  
UNITED STATES DISTRICT JUDGE